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No. 66229-5-I
Skagit County Superior Court No. 09-1-00909-0

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION ONE

STATE OF WASHINGTON,
Plaintiff-Appellee,

v.

MICHIEL GLEN OAKES,
Defendant-Appellant.

ON APPEAL FROM THE SUPERIOR COURT OF THE STATE OF
WASHINGTON FOR SKAGIT COUNTY

The Honorable Michael E. Rickert, Judge

APPELLANT'S REPLY BRIEF

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I.
REPLY STATEMENT OF THE CASE

Oakes will discuss any factual disagreements within the relevant argument sections.

II.
REPLY ARGUMENT

A. THE TRIAL JUDGE ERRED WHEN HE PLACED TEMPORAL LIMITATIONS ON FACTS THAT WOULD HAVE SUPPORTED OAKES'S CLAIM OF SELF-DEFENSE

The State's position appears to be that the only relevant evidence regarding self-defense was Oakes's description of the altercation at Stover's home on October 28, 2008. The State notes that, if the jury believed that Oakes shot Stover only after Stover first attempted to shoot Oakes, it would have acquitted based on self-defense. Respondent's Brief (RB) at 22. While that is true, the jury's assessment of the shooting itself was necessarily influenced by the background evidence. The State's position was that Oakes went to Stover's home with the intent to kill him. The defense position was that Oakes went there to convince Stover that the wedding photos could not be found and that he should leave Oakes and Opdycke alone. That Oakes made the trip armed with a gun and carrying

items that would help him escape if necessary made sense only in the context of Stover's long history of violence.

The State relies on a 91-year-old case in arguing that violent acts of the decedent are not admissible if they are too remote in time. RB 23, discussing *State v. Adamo*, 120 Wn. 268, 207 P. 7 (1922). More recent cases, however, establish that *all* such acts are admissible in a self-defense case. See AOB at 25-27. *Adamo* is in any event distinguishable from this case. In *Adamo*, the defendant wished to admit a single, isolated instance of aggressive behavior by the decedent, which occurred five years before the murder. *Id.* at 269. The Court upheld the exclusion of that evidence, apparently concluding that it shed insufficient light on the defendant's fear of the decedent at the time of the killing. Here, however, as in the cases cited in the opening brief, the decedent had a long, consistent history of violent and threatening acts. In that scenario, the full picture is relevant and admissible.

The State maintains that defense counsel invited any error by proposing a limitation on any incidents prior to 2006. In fact, defense counsel took the consistent position that the court could place no temporal limitation on self-defense evidence. See, e.g., CP 560-81; 10/8/10 RP 15. When the trial court questioned whether some of the evidence was too

remote, however, the defense noted at first that they believed the testimony would involve incidents after 2005. 10/8/10 RP 30. Because the trial court found such incidents to be admissible, the defense dropped the subject.

During Linda Opdycke's testimony, however, it first became clear that certain incidents took place in the summer of 2005. Defense counsel then explicitly requested that the court draw its "line in the sand" six months earlier than January 1, 2006. 10/13/10 RP 241. The court refused, and defense counsel acquiesced in that ruling. *Id.* The defense never affirmatively argued, however, in favor of the 2006 limitation.

B. THE EXCLUSION OF EVIDENCE OF ANY OF STOVER'S ACTS OF VIOLENCE OCCURRING BEFORE JANUARY 1, 2006, VIOLATED OAKES'S RIGHT TO PRESENT A DEFENSE

The State has failed to address this claim in its brief. A respondent who elects not to file a brief allows his or her opponent to put unanswered arguments before the court, and the court is entitled to make its decision based on the argument and record before it. *Adams v. Dep't of Labor & Indus.*, 128 Wn.2d 224, 229, 905 P.2d 1220, 1222 (1995). Absent any meaningful response by the State, this Court should find a constitutional violation. Moreover, the State has the burden to demonstrate

that any violation of Oakes's right to present a defense is harmless beyond a reasonable doubt. *Chapman v. California*, 386 U.S. 18, 24, 87 S.Ct. 824, 17 L.Ed.2d 705, *reh'g denied*, 386 U.S. 987, 87 S.Ct. 1283, 18 L.Ed.2d 241 (1967). The State offers no argument at all that this constitutional violation was harmless.

C. THERE WAS INSUFFICIENT EVIDENCE FOR THE JURY TO CONCLUDE THAT OAKES DID NOT ACT IN SELF-DEFENSE

The State's argument suggests that Oakes was personally unaware of Stover's volatile personality and threats of violence. It is true that some of his information regarding Stover came from Opdycke. But it is not as if this evidence was uncorroborated. Stover had pled guilty to stalking Opdycke and there was a video of Stover creeping around Opdycke's home in the middle of the night. Much of what Oakes learned was from telephone messages Stover left for Oakes. The State never denied that Stover made the calls or challenged the accuracy of the recordings in which Stover threatened Opdycke. Moreover, long before Oakes became involved with Opdycke, an unbiased witness, John Bonica was threatened by Stover after he dated Opdycke.

And the State fails to acknowledge Oakes's un rebutted testimony that Stover threatened him and his children after Stover approached Oakes in a parking lot in Kennewick in May, 2009. 10/12/10 RP 143-147. Oakes was personally subjected to Stover's obsessive demands regarding the wedding pictures. 10/12/10 RP 148. Thus, this Court should reject the State's subtext – that all of the information that Oakes had about Stover's violent nature was suspect, of dubious origin or second-hand.

Oakes admits that he purchased camouflage clothing and tools, wore a kevlar vest and took a weapon to his meeting with Stover. He also admitted that he disposed of the body. But, that does not disprove self-defense beyond a reasonable doubt. The other undisputed evidence established that Stover kept weapons, ignored a previous domestic violence protection order, and harassed and stalked Opdycke. Oakes testified that Stover acted consistently with his historical patterns and was armed and agitated when he met Oakes on October 28, 2009.

D. THE COURT SHOULD HAVE SUPPRESSED THE GUN FOUND IN A PLASTIC BAG AT OPDYCKE'S HOME

1. Oakes has Standing to Object to the Seizure of the Bag Under Article 1, Section 7

The State's argument regarding the "open fields" exception is not clear. The Washington Supreme Court's decision in *State v. Myrick*, 102

Wn.2d 506, 688 P.2d 151 (1984), however, unquestionably rejects that exception under Article I, section 7. *See* Appellant's Opening Brief (AOB) at 37-38.

Oakes has cited cases holding that areas much farther from a home than the embankment at issue here are part of the curtilage. AOB at 37. The State does not question the validity of those cases.

The State's reliance at RB 35 on *State v. Tidwell*, 23 Wn. App. 506, 597 P.2d 434 (1979), is misplaced for at least two reasons. First, *Tidwell* relied on Fourth Amendment jurisprudence. *Id.* at 507-08. The case arose long before the Washington Supreme Court found greater protection for discarded items under Article I, section 7. *See* AOB at 38-39. Second, Mr. Tidwell had no expectation of privacy in either the hallway in which the police confronted him or the bushes in which he tossed his drugs. *Tidwell* at 507-08.

2. The Exigent Circumstances Exception does not Apply

In almost the same breath, the State maintains that obtaining a warrant to seize the bag was impractical, and then notes that the State did later obtain a warrant. RB 39. Further, the State ignores the fact that the officers were at Opdycke's home to ensure that Oakes's car remained there

until a Skagit County warrant issued. The officers could have followed the same procedure as to the bag.

Similarly, the State maintains that the bag was thrown into the “misty weather of the night,” in an apparent attempt to suggest that the evidence would have deteriorated if not seized quickly. RB 39. At the same time, the State notes that there was no need for Oakes to shut his car windows in order to keep his car dry. RB 31.

E. THE TRIAL COURT ERRED IN PERMITTING THE STATE TO “IMPEACH” OAKES WITH TEXT MESSAGES THAT HAD BEEN UNCONSTITUTIONALLY OBTAINED

1. Even Under Federal Standards, the Text Message was not Admissible Because Oakes did not Commit Perjury

The State maintains that suppressed evidence may be admitted even if it does not clearly show that the defendant committed perjury on the stand. The State relies on a single sentence in *State v. Greve*, 67 Wn. App. 166, 834 P.2d 656 (1992), *review denied*, 121 Wn.2d 1005, 848 P.2d 1263 (1993), stating that a suppressed statement may be unreliable – and therefore inadmissible even for purposes of impeachment – due to the manner in which the police obtained it. RB 43-44, quoting *Greve* at 174-75.

The flaw in the State's reasoning is that the cited portion of *Greve* discusses only one way in which a prior statement may be insufficiently reliable. The touchstone is that suppressed evidence may be admitted only when it clearly shows that the defendant committed perjury at trial. This is clear from *Greve* itself and from the U.S. Supreme Court cases on which it relies. *See* AOB at 44-47. Thus, the testimony at trial must directly contradict the suppressed evidence. Further, even when there is a clear contradiction, the suppressed evidence must be so reliable that it, rather than the trial testimony, must be the truth. In this case, neither condition was met. *See* AOB at 47-49.

2. In the Alternative, the Court Should Find that Article I, Section 7 Provides Greater Protection

The State presents no meaningful argument to rebut Oakes's analysis of Article I, section 7. It merely agrees with the U.S. Supreme Court's reasoning that the exclusionary rule should not apply when a defendant testifies falsely.

3. The Error was Prejudicial

The State maintains that the suppressed text message was cumulative of testimony from Oakes's ex-wife Jennifer Thompson. Nearly everything Thompson said, however, was consistent with Oakes's

testimony. For example Thompson said Oakes referred to a “dangerous job,” 10/1/10(PM) RP 94, and Oakes testified that he had a frightening meeting that day with Stover regarding the wedding pictures. 10/10/12 RP 169. He also acknowledged that he texted something along the lines of “no job means no pay” as Thompson testified. 10/12/10 RP 167, 173-174.

The prosecutor argued to the jury, however, that the exact words of the text message (“Job Failed. No pay or damage.”) were far more incriminating than the testimony. 10/10/18 RP 26-27. Further, the prosecutor went beyond using the text messages for impeachment, but rather used them improperly as substantive evidence of guilt. *See State v. Gauthier*, -- Wn. App. -- , 298 P.3d 126, 132-33 (2013) (suppressed statement of defendant should have been used solely for impeachment rather than as substantive evidence of guilt).

F. THE COURT IMPROPERLY EXCLUDED TESTIMONY FROM MEGHAN MATAYA

The defense was precluded presenting testimony from Meghan Mataya regarding the following statements made by Mark Stover: (1) that Stover saw Opdycke and Oakes together at a Costco in Kennewick (a five-hour drive from Stover’s home and business); and (2) that Stover asked Mataya to travel with him to Montana and to carry a gun and ammunition

for him. Oakes has explained why the statements were not truly precluded by the hearsay rule. AOB at 53-64.

The State's first response is that defense counsel were being deceptive when they said the evidence was not offered for the truth of the matter, because they actually did want the jury to believe that Stover made those two journeys. In fact, defense counsel properly pointed out that there were multiple reasons why the testimony was relevant and admissible. For example, the statements were relevant to Stover's state of mind, which the State expressly put in issue. *See* AOB at 56-61. But the statements were also admissible to prove that Stover truly did go to Montana and Kennewick at certain times, as Oakes claimed. *See* AOB at 61-63.

In addition, in the course of the conversation about going to Montana, Mataya observed Stover drop some bullets in her car. 10/14/10 RP 109. That in itself was a violation of the domestic violence protection order against Stover, which the State maintained he scrupulously obeyed. Obviously, Stover's physical actions were not hearsay statements.

The prosecutor appears to misunderstand Oakes's argument regarding implied assertions. Oakes has explained that only express assertions are subject to the hearsay rule; implied assertions are not, and

therefore are admissible to circumstantially prove a matter at issue. *See* AOB at 61. Specifically, Stover’s statement that he saw Opdycke and Oakes at the Kennewick Costco is an implied assertion that he tracked Opdycke to that location, thereby continuing his stalking behavior after the State maintains that he stopped. *Id.*

The State responds by correctly noting that the hearsay rules apply only to “assertions” and that “nothing is an assertion unless intended to be one.” RB 50, quoting *State v. Collins*, 76 Wn. App. 496, 499, 886 P.2d 243, *review denied*, 126 Wn.2d 1016, 894 P.2d 565 (1995). The State *agrees* that “Stover did not intend to assert by making the statements that he was continuing in the claimed stalking behavior.” RB 50. “That may be an inference that Oakes wanted to draw from the alleged statements. But to assert that Stover intended to assert that he was stalking them as a result of the statements is not a tenable argument.” RB at 50-51.

Oakes fully agrees with this analysis. Stover clearly did *not* intend to assert that he was stalking Opdycke and Oakes. That is exactly why the statement is not subject to the hearsay rule. *See United States v. Giraldo*, 822 F.2d 205, 212-13 (2d Cir.), *cert. denied*, 484 U.S. 969, 108 S.Ct. 466, 98 L.Ed.2d 405 (1987) (holding that answering machine messages placing orders for “chicken” and “bread” were not hearsay and were admissible as

circumstantial evidence that the defendant possessed cocaine for sale); *United States v. Rodriguez-Lopez*, 565 F.3d 312, 314-15 (6th Cir. 2009) (holding that requests to purchase heroin were not hearsay because the government did not offer them for their truth, nor did they assert anything); *United States v. Oguns*, 921 F.2d 442, 448-49 (2d Cir. 1990) (holding that unidentified caller's question, "Have the apples arrived there?" was properly admitted as non-hearsay because it was not an assertion); *United States v. Lewis*, 902 F.2d 1176, 1179 (5th Cir. 1990) (holding that unidentified caller's question, "Did you get the stuff?" was not an assertion and therefore was not hearsay); *State v. Chavez*, 225 Ariz. 442, 444, 239 P.3d 761, 763 (Ct. App. 2010) (text messages seeking drugs were not hearsay).

The prosecutor does not even respond to Oakes's explanation of the *Hillmon* doctrine, which permits testimony that a person planned to travel to a certain place for the purpose of establishing that he likely did go to that place. *See* AOB at 62-63.

G. AT HIS PRELIMINARY HEARINGS IN DISTRICT COURT, OAKES WAS DENIED HIS RIGHT TO A PUBLIC TRIAL AND HIS RIGHT TO COUNSEL

The State argues first that the courtroom was not truly closed. It cites the testimony of the court administrator that members of the public

could press a buzzer and ask to enter the locked courtroom to attend the 7:00 calendar. The administrator acknowledged, however, that she had no personal knowledge whether the jail staff generally allowed entry. If someone were denied entry, she would not know that unless the person complained to her. All she could say was that she had occasionally seen people whom she did not recognize as local lawyers in the courtroom at the 7:00 calendar. 7/26/12 RP 30. This courtroom was part of the jail and she had no responsibility for jail operations. *Id.* at 29-30.

The State also claims that no evidence was presented regarding people being excluded from the calendar. In fact, the trial court found that attorney David Wall had attempted at least twice to bring family members of a defendant with him into the courtroom and they had been denied access. The constitutional right to a public trial specifically includes the right to have family members present. *See, e.g., United States v. Rivera*, 682 F.3d 1223 (9th Cir. 2012) (reversing sentencing because court excluded members of defendant's family). Mr. Wall had never seen a member of the public present on the 7:00 calendar during his 15 years handling criminal cases in Skagit County, as Chief Criminal Deputy and as a defense lawyer.

In this case, when Mr. Oakes asked his prospective lawyer, Corbin Volluz, whether family members could attend his first hearing, Mr. Volluz told him that they could not because the courtroom would be locked. Mr. Volluz's understanding was based on 20 years of practice in Skagit County. *See* 3rd Supp. CP 989-996.

The trial court found that it was "very difficult" for a member of the public to attend a hearing on this calendar. Oakes has cited numerous cases holding that such difficulties amount to a closure. AOB at 73-75. The State does not respond to those authorities at all.

The State cites *State v. K.K.H.*, 75 Wn. App. 529, 878 P.2d 1255 (1994), *review denied*, 126 Wn.2d 1015, 894 P.2d 565 (1995), for the proposition that probable cause determinations need not be open to the public. That case, however, did not address the right to an open courtroom. Further, it did not discuss the constitutional requirements for bail hearings. Oakes has shown that bail hearings are considered a critical stage of the proceedings, at which the right to counsel and to an open, public courtroom apply. AOB at 75-82.

The State relies on *State v. Momah*, 167 Wn.2d 140, 149-150, 217 P.3d 321 (2009), *cert. denied*, 131 S.Ct. 160, 178 L.Ed.2d 40 (2010), for the proposition that not all erroneous courtroom closures are structural

error requiring automatic reversal. RB 64-65. The Supreme Court, however, has cautioned prosecutors not to rely on *Momah* for precedent on that issue. “We emphasize that it is unlikely that we will ever again see a case like *Momah*.” *State v. Wise*, 176 Wn.2d 1, 15, 288 P.3d 1113, 1120 (2012).

H. OAKES WAS DENIED DUE PROCESS AND THE RIGHT TO A FAIR AND IMPARTIAL JURY UNDER THE SIXTH AMENDMENT TO THE U.S. CONSTITUTION AND ARTICLE I, SECTION 22 OF THE WASHINGTON CONSTITUTION WHEN A JUROR TWEETED ABOUT THE CASE DURING TRIAL

The State argues that the juror’s tweets were not in violation of the Court’s order not to discuss the case with anyone. The State insists that the facts tweeted by the juror could have been stated by any juror because they were not a “discussion.” The word discussion means simply: “To consider or examine in speech or writing.” Webster’s On-Line Dictionary. Discussion does not require interaction with another speaker. And no reasonable juror could have misconstrued the Judge’s statement that he or she should not “discuss” to mean that tweeting about the trial was permissible and not in violation of the Court’s admonitions. Thus, the juror’s actions were misconduct.

The prosecutor also seems to endorse the juror's excuse that the Court prohibited only use of the "internet" but not tweeting. One must use the internet, however, in order to send a tweet.

A juror's demonstrated inability to follow the trial court's instructions should result in reversal of the conviction.¹ A juror who cannot follow a simple order not to discuss the case, cannot be relied upon to follow the trial court's instructions on the law. Thus, reversal is required. *Dimas-Martiez v. State*, 2011 Ark. 515, 385 S.W.3d 238 (2011).

III. CONCLUSION

For the reasons stated above, this Court must reverse Oakes's conviction.

¹ The juror here posted information that disclosed discussions among the jurors about their attitudes and opinions and his exhaustion. The risk with this kind of misconduct is that communications could have been read by participants in the trial who might subtly adjust their trial strategy to take advantage of these ex parte communications. For example, an exhausted juror may be unable to fully concentrate on the trial proceedings. Thus, a party could decide to rearrange its witness list in order to present its weakest evidence on that day that a juror would be inattentive or sleepy.

DATED this 3 day of July, 2013.

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CERTIFICATE OF SERVICE

I hereby certify that on the date listed below, I served by United States Mail one copy of this brief on the following:

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